IN THE UNITED STATES DISTRICT COURT FOR THE WESTERN DISTRICT OF TEXAS

SERVICE LLOYDS INSURANCE
COMPANY

Plaintiff,

V.

CIVIL ACTION NO. 1:19-CV-518

NORTH AMERICAN RISK SERVICES,
INC.

Defendant/Third-Party Plaintiff,

V.

TEE & GEE GROUP, LLC;
CORECARE MANAGEMENT; AND
PRIME HEALTH SERVICES, INC.,

Third-Party Defendants.

Third-Party Defendants.

AFFIDAVIT IN SUPPORT OF MOTION FOR ENTRY OF DEFAULT JUDGMENT

- I, Martin S. Schexnayder, being duly sworn, state as follows:
 - 1. I am the attorney for Third-Party Plaintiff North American Risk Services, Inc. ("NARS") in the above-entitled action and I am familiar with the file, records and pleadings in this matter.
 - 2. The summons and Third-Party Complaint were filed on May 17, 2019.
 - 3. Third-Party Defendant Prime Health Services, Inc. ("Prime") was served with a copy of the summons and complaint on May 20, 2019, as reflected on the docket sheet by the proof of service filed on June 4, 2019. Prime's answer to the Third-Party Complaint was due on June 14, 2019.
 - 4. The default of Prime was entered on July 25, 2019.
 - 5. As required by the Servicemembers Civil Relief Act of 2003, I have confirmed that Prime is not currently in active military service.
 - 6. To my best information and belief, Prime is not an infant or incompetent person.
 - 7. The claim of NARS is as follows: in the event that NARS is found liable for any damages sought by Plaintiff, that NARS may have recovery against Prime for any

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and all damages arising from Prime's conduct in this matter, including but not limited to penalties and fines which resulted from Prime's alleged inaccurate and untimely EDI (Electronic Data Interchange) filings.

Martin S. Schexnayder

SUBSCRIBED and SWORN to before me this 29th day of July, 2019.

CAROL PERSONAL CONTRACTOR OF TEXAS

NOTARY PUBLIC in and for the State of TEXAS